

CCTV POLICY

No: 39A

Reviewed: December 2019



ST ANDREW'S C of E PRIMARY SCHOOL

CCTV POLICY

RATIONALE – St Andrew's School is a place where everyone is valued and cared about. Each child's learning is enhanced through teaching them effectively. This takes place in an environment that provides intellectual, emotional and physical safety, is sensitive to their needs, challenging and allows success to be celebrated.

INTRODUCTION

- The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at St Andrew's CE Primary School.
- The CCTV is owned by the school and is in operation 24 hours per day, each day of the year.
- The system comprises of a number of fixed cameras located around the school entrance area.
- The system is monitored by designated trained staff: Headteacher, Business Manager and Administrator. All authorised operators with access to the CCTV are aware of procedures that need to be followed when accessing recorded images and sound.
- This school's CCTV scheme is registered with the Information Commissioner under the Data Protection Act 2018. The use of CCTV and any sound recordings is covered by the Data Protection Act 2018. This policy outlines the school's use of CCTV and how it complies with the Act.

PRIMARY PURPOSE

The purposes for which the CCTV Systems are used are:

- To increase personal safety of pupils, staff and visitors, and reduce the risk of crime
- To protect the school buildings and their assets
- To support the Police in a bid to deter and detect crime
- To assist in identifying, apprehending and potentially prosecuting offenders
- To ensure that the school rules are respected so that the school can be properly managed

STATEMENT OF INTENT

- The school complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at:
<https://ico.org.uk/about-the-ico/ico-and-stakeholder-consultations/cctv-code-of-practice-revised/>
- CCTV warning signs will be clearly and prominently placed at the entrance of the school where the cameras are located.
- Parents will also be informed of the CCTV system via the school prospectus, and through signage.
- School staff, governors and other regular users will be informed of the CCTV system via internal information systems.
- A copy of this policy will be placed onto the school website.
- The planning and design has endeavoured to ensure that the Scheme will give maximum effectiveness and efficiency but it is not possible to guarantee that the

system will cover or detect every single incident taking place in the areas of coverage.

- Materials or knowledge secured as a result of CCTV will not be used for commercial purposes
- A log detailing every access of the CCTV system will be kept along with details of any data that has been downloaded with the reasons why.
- Covert Monitoring does not form part of the daily CCTV system as detailed in this policy. For covert monitoring to be considered there must be good cause to suspect that illegal or unauthorised action is taking place or grounds to suspect serious misconduct. In these circumstances, authorisation to operate covert monitoring must be given by the Chair of Governors and Headteacher after careful consideration and consultation with advice from our Data Protection Officer (DPO).

JUSTIFICATION

- The Data Protection Act requires that data is "adequate, relevant and not excessive" for the purpose for which it is collected. This means that the school needs to be able to justify the obtaining and use of personal data by means of a CCTV system. The use of CCTV to control the perimeter of the school buildings for security purposes has been deemed to be justified by the school management team and Governing Body. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation.
- CCTV systems will not be used to monitor normal teacher/student classroom activity in school.
- In other areas of the school where CCTV has been installed, the school has demonstrated that there is a proven risk to security and/or health & safety and that the installation of CCTV is proportionate in addressing such issues that have arisen prior to the installation of the system.
- The school will regularly review the justification for CCTV, and that the use does not contravene individual's privacy rights. To this end, the school has completed a Data Protection Impact Assessment which is available to view on request.

STORAGE, RETENTION AND ACCESS TO IMAGES

- Data is recorded on a memory card securely within the camera where images are recorded over when the card becomes full. Recorded data will not be retained for longer than necessary, approximately 30 days. While retained the recordings will be maintained to protect the rights of the people whose images have been recorded.
- All recorded data will be stored securely within the software. Any data that is required to be retained longer than the loop period will be downloaded onto an encrypted memory stick whilst the data is required and kept securely.
- Access to recorded images will be restricted to those staff authorised to view them, and not made more widely available.
- The system will be checked daily by one of the designated staff to ensure cameras are properly recording and functional.
- There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the school where they would reasonably need access to the data (i.e. investigators).

- The school's IT systems provider (2IT Systems) will have access to the system for aiding correct use of the software and hardware.

SUBJECT ACCESS REQUESTS

- Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.
- All requests should be made to the Headteacher in writing. Individuals submitting requests will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.
- . The school will respond to requests within one month of receiving the written request. The school may extend this by a further two months if the request is deemed complex..
- The school reserves the right to refuse access to CCTV footage where it is deemed manifestly unfounded, excessive, or where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

BREACHES OF THE CODE

- Any breach of the code of practice by school staff will be initially investigated by the Headteacher, in order for them to take the appropriate disciplinary action.
- Any breach of the code of practice will also be reported to the school's DPO and an independent investigation may be undertaken to make recommendations on how to remedy the breach.

COMPLAINTS

- Any complaints about the school's CCTV system should be addressed to the Headteacher. Complaints will be addressed in connection with the school complaints policy.

Policy Review

- This policy will be reviewed following any major changes in legislation and/or every three years by the Finance & Premises Committee

Headteacher signature:

Date:

Chair of Finance and Premises signature:

Date: